January 15, 2025

## VIA ECF

Hon. Naomi Reice Buchwald United States District Court Southern District of New York United States Courthouse 500 Pearl Street New York, New York 10007

Re: TrackMan, Inc. v. GSP Golf AB d/b/a GSPro et al., No. 23-cv-598-NRB (S.D.N.Y.)

The parties respectfully request an extension of time of one week, until January 22, 2025, to file a proposed stipulated protective order and proposed stipulated ESI order.

The original date for the parties to file these papers is January 15, 2025. ECF No. 75 at 3. The parties are discussing drafts and revising them with the aim of submitting stipulated proposals.

The parties have not made any prior requests to extend this deadline. The parties have made two prior requests for extensions, unrelated to this current request. One was made by plaintiff TrackMan, Inc. (ECF No. 24), and one was made by defendants Chad Cooke and SimulatorGolfTour LLC (ECF No. 63). The Court granted these requests. 63). The Court granted these requests. ECF Nos. 26 & 65.

This extension will not affect any other case deadlines.

All parties consent to the requested extension.

Respectfully,

## GOODWIN PROCTER LLP

By: /s/ Stefan Mentzer Stefan Mentzer Scott, T. Weingaertner Timothy Keegan The New York Times Building 620 Eighth Avenue New York, New York 10018 Tel. + 1 212 813 8800 smentzer@goodwinlaw.com sweingaertner@goodwinlaw.com tkeegan@goodwinlaw.com

Attorneys for Plaintiff and Counterclaim-Defendant TrackMan, Inc.

## FRANKFURT KURNIT KLEIN & SELZ, P.C.

By: /s/ Caren Decter Caren Decter Jeremy S. Goldman 28 Liberty Street, 35th Floor New York, New York 10005 Tel. +1 212 980 0120 cdecter@fkks.com igoldman@fkks.com

Attorneys for Defendants and Counterclaim-Plaintiffs GSP Golf AB and Davor Bogavac